

AFFIDAVIT

I, Robert Quan, state:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Internal Revenue Service, Criminal Investigation (“IRS-CI”) since 2019. I am assigned to the IRS-CI Boston, Massachusetts Field Office, where I investigate various forms of financial crime, including tax violations, theft of government funds, and investment frauds.

2. I submit this affidavit in support of an application for a criminal complaint charging LONNIE SMITH-MATTHEWS (“SMITH-MATTHEWS”) with one count of theft of government funds, in violation of 18 U.S.C. § 641, and one count of bank fraud, in violation of 18 U.S.C. § 1344(1), and for a warrant for SMITH-MATTHEWS’ arrest.

3. The facts in this affidavit come from my personal knowledge, information that other law enforcement agents provided, information I obtained through witness interviews, and my review of records described below. This affidavit is not intended to set forth all of the information that I have learned during this investigation and includes only the information necessary to establish probable cause for the requested complaint and arrest warrant.

PROBABLE CAUSE TO BELIEVE THAT A FEDERAL CRIME WAS COMMITTED

Background

4. The “Credit Union” is a financial institution in Massachusetts.

5. According to Massachusetts Registry of Motor Vehicle (“RMV”) records, SMITH-MATTHEWS lives at [REDACTED] in Hyde Park, Massachusetts 02136. Below is his photo from RMV records:



6. On or about May 7, 2021, SMITH-MATTHEWS opened a checking account at the Credit Union in the name of MEMBERS ONLY THE FAMILY CLOTHING INC. with an account number ending in 1664 (the “1664 Account”). On the account application that he signed, SMITH-MATTHEWS listed himself as the owner of the business.

7. On or about the same day, SMITH-MATTHEWS registered MEMBERS ONLY THE FAMILY CLOTHING LLC as a Massachusetts limited liability corporation (“MEMBERS ONLY”). Corporate filings for MEMBERS ONLY list SMITH-MATTHEWS as the company’s only officer and agent.

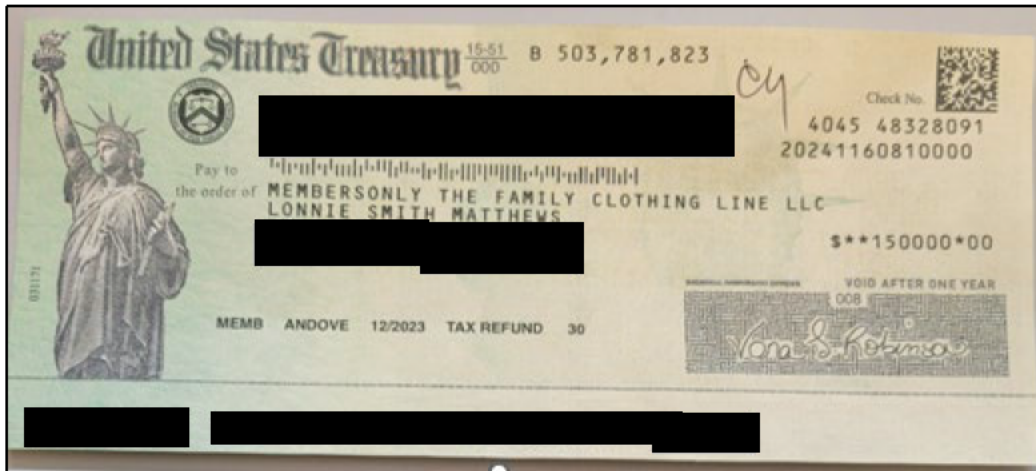
8. Documents from the Massachusetts Secretary of State show that the Commonwealth administratively dissolved MEMBERS ONLY on December 29, 2023.

9. In about 2022, the IRS received a Form SS-4 requesting an Employer Identification Number (“EIN”) for MEMBERS ONLY. The form referenced the Social Security number [REDACTED]-2260, which belongs to SMITH-MATTHEWS. The IRS assigned MEMBERS ONLY the EIN [REDACTED] 8515.

Theft of Government Funds

10. On or about June 25, 2024, SMITH-MATTHEWS entered the Credit Union branch

in Roslindale and deposited a U.S. Treasury check, numbered 4045-48328091 and payable to MEMBERS ONLY THE FAMILY CLOTHING LINE LLC in the amount of \$150,000.00, into the 1664 Account. The memo on the check referenced “MEMB ANDOVE 12/2023 TAX REFUND 30”. Based on my training and experience investigating tax fraud, I know that this memo refers to a Form 1040 for individuals filed for tax year 2023 and processed by the IRS at its service center in Andover, Massachusetts. An image of the check appears below.



11. IRS records show that MEMBERS ONLY never filed any tax returns, including any returns that would generate a refund.

12. IRS records show that SMITH-MATTHEWS filed a Form 1040 for 2023. The refund due from that return was \$1,855.

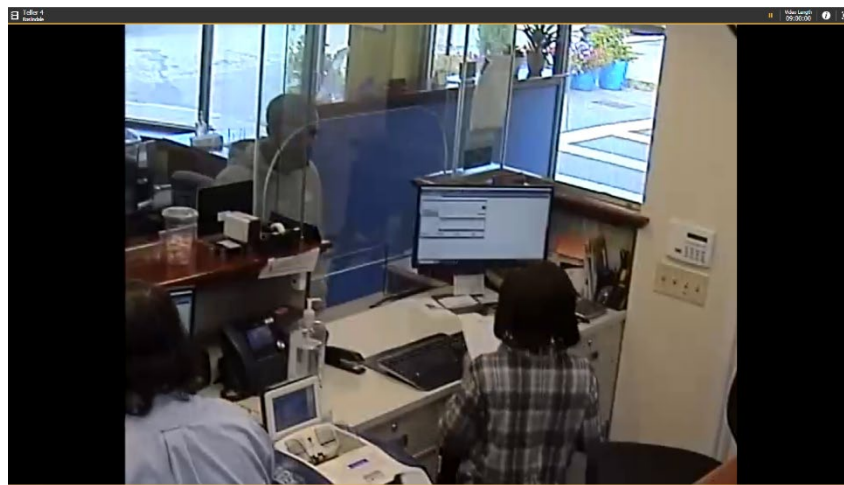
13. IRS records show that U.S. Treasury Check 4045-448328091 was actually issued to a married couple in North Carolina and not to MEMBERS ONLY THE FAMILY CLOTHING LINE LLC.

14. Based on the information provided above, there is probable cause to believe that on or about June 25, 2024, SMITH-MATTHEWS stole and knowingly converted to his use or the use of another a record, voucher, money, or thing of value of the United States or of any department or agency thereof, specifically a U.S. Treasury check for \$150,000.

Bank Fraud

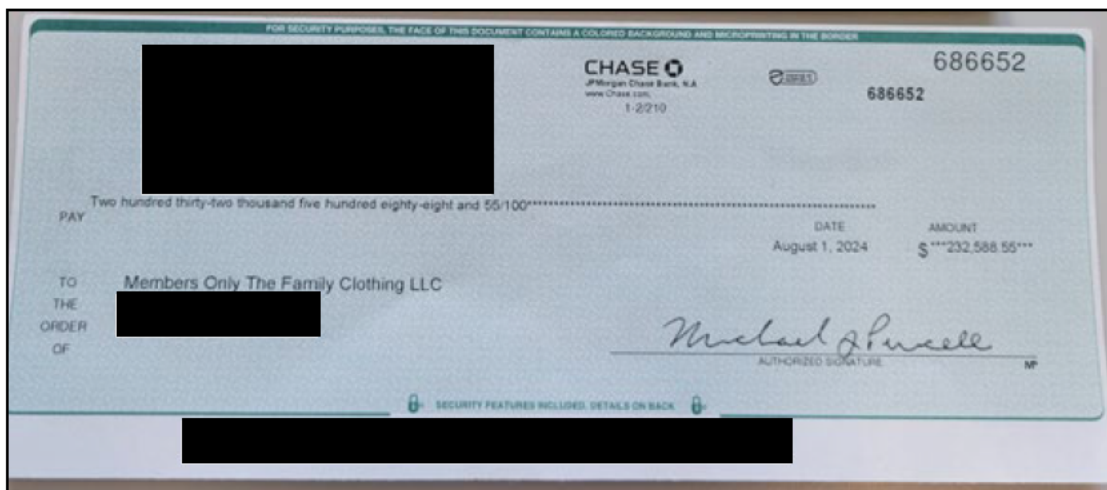
15. On or about August 26, 2024, SMITH-MATTHEWS entered the Credit Union branch in Roslindale and deposited a check numbered 686652, from a New York law firm payable to MEMBERS ONLY THE FAMILY CLOTHING LLC in the amount of \$232,588.55, into the 1664 Account.

16. Bank surveillance captured images of SMITH-MATTHEWS in the branch at or around the time of the deposit. Images from this surveillance appear below. I have included a close-up of SMITH-MATTHEWS' head and shoulders.





17. An image of the check that SMITH-MATTHEWS deposited appears below.



18. On or about the same day, the Credit Union placed a hold on \$226,838.55 of the deposit, but made available \$5,000 in the 1664 Account.

19. On or about April 22, 2025, I spoke with a representative of the New York law firm about check number 686652, who told me, in substance, that the check was real but that the true payee was not MEMBERS ONLY THE FAMILY CLOTHING LLC.

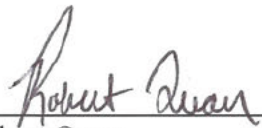
20. On or about May 9, 2025, the representative from the New York law firm told me that the firm has no records of any checks issued to either MEMBERS ONLY THE FAMILY CLOTHING LLC or SMITH MATTHEWS.

21. Records from the New York law firm show that it issued check number 686652 to pay an Illinois entity for online services.

22. Based on Credit Union records, on or about November 14, 2024, a Credit Union officer spoke with SMITH MATTHEWS by phone about the \$150,000 check and the \$232,588.55 check described above. In substance, SMITH MATTHEWS first stated that the checks resulted from loans he obtained through Mass.gov, but then stated that the loans were actually from the Small Business Administration. When questioned what he did with the money, SMITH MATTHEWS stated, in part, that he paid a roofing company to repair the roof on the storefront for his business, but that he did not know the address of his storefront.

23. Based on the information provided above, there is probable cause to believe that on or about August 26, 2024, SMITH-MATTHEWS knowingly executed or attempted to execute a scheme or artifice to defraud the Credit Union, a financial institution, by depositing a falsified check for \$232,588.55, in violation of 18 U.S.C. § 1344(1).

Sworn to under the pains and penalties of perjury,


Robert Quan
Special Agent
Internal Revenue Service
Criminal Investigation

Subscribed and sworn to before me telephonically pursuant to Rule 4.1(a) on **June 4, 2025**.


Hon. JENNIFER C. BOAL
United States Magistrate Judge

